

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA and
STATE OF MICHIGAN, ex rel.,
ASHWANI SHEORAN, RPh,**

Plaintiff-Relator,

v.

Honorable John Corbett O'Meara
Magistrate Judge Michael Hluchaniuk

Case No. 5:13-cv-10568-JCO-MJH

**WAL-MART STORES EAST, LP, d/b/a
WALMART, a foreign corporation
TOI WALKER,
DOUG HENGER,
ALFRED RODRIGUEZ,
RICHARD LOCKARD, M.D.,
NAVEED MAHFOOZ, M.D., and
TAREK EZZEDDINE, M.D.,**

JURY TRIAL DEMANDED

Jointly and Severally,

Defendants.

**THE STINNETT LAW GROUP, PLC
ANN MARIE STINNETT (P66209)
101 W. Big Beaver Rd., Suite 1400
Troy, Michigan 48084
(248) 687-1536
ams@stinnettlawgroup.com
Attorney for Plaintiff-Relator**

**UNITED STATES ATTORNEY'S OFFICE
PETER A. CAPLAN (P30643)
LYNN MARIE DODGE (P38136)
211 W. Fort St., Suite 2001
Detroit, Michigan 48226
(313) 226-9784 (Peter A. Caplan)
(313) 226-9100 (Lynn Marie Dodge)
peter.caplan@usdoj.com
lynn.dodge@usdoj.com**

NOTICE OF AMENDED COMPLAINT

Plaintiff-Relator Ashwani Sheoran, RPh files this Notice of Amended Complaint to give parties served with the original unsealed complaint notice that an amended complaint was filed but not served. The amended complaint is still sealed. This is not the ideal situation as the complaint and amended complaint should be served together.

Plaintiff-Relator's counsel was informed that the motion from the U.S. Attorney's Office to unseal the complaint did not include unsealing the amended complaint. This discrepancy was shared with Ms. Lynn Dodge from the U.S. Attorney's Office. She represented that she filed a motion to unseal the amended complaint with proposed order, but given the sealed nature of the case, such motion is not visible to the public or to the parties served.

Respectfully submitted,

THE STINNETT LAW GROUP, PLC

By: /s/Ann Marie Stinnett
ANN MARIE STINNETT (P66209)
101 W. Big Beaver Rd., Suite 1400
Troy, Michigan 48084
Telephone: (248) 687-1536
Fax: (248) 630-2600
ams@stinnettlawgroup.com
Attorney for Plaintiff-Relator

Dated: June 27, 2018

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2018, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to all counsel of record at the following email addresses:

peter.caplan@usdoj.gov

lynn.dodge@usdoj.gov

A paper copy of this Notice was mailed to the following on June 27, 2018:

Walmart Stores East, LP
702 SW 8th Street
Bentonville, AR 72716-6209

Alfred Rodriguez
HR Director
Walmart Health & Wellness
702 S.W. 8th Street
Bentonville, AR 72716-0430

Tarek Ezzeddine
1525 W. Caro Rd. #A
Caro, Michigan 48723

Naveed Mahfooz
1525 W. Caro Rd. #A
Caro, Michigan 48723

Richard Lockard
6 N. Main St.
Elkton, MI 48731

Toi Walker
Walmart Health and Wellness Market Director
6170 S. Saginaw Rd.
Grand Blanc, MI 48439

Doug Henger
Walmart Health and Wellness Regional Director
17199 Laurel Park Drive North, Suite 401
Livonia, Michigan 48152

THE STINNETT LAW GROUP, PLC

By: /s/Ann Marie Stinnett
ANN MARIE STINNETT (P66209)
101 W. Big Beaver Rd., Suite 1400
Troy, Michigan 48084
Telephone: (248) 687-1536
Fax: (248) 630-2600
ams@stinnettlawgroup.com
Attorney for Plaintiff-Relator

Dated: June 27, 2018